

ESTTA Tracking number: **ESTTA826282**

Filing date: **06/12/2017**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

## Notice of Opposition

Notice is hereby given that the following party opposes registration of the indicated application.

### Opposer Information

Name	Mattel, Inc.
Granted to Date of previous extension	06/17/2017
Address	333 Continental Boulevard, M1-1518 El Segundo, CA 90245 UNITED STATES

Attorney information	William M. Merone Andrews Kurth Kenyon LLP 1350 I Street, N.W. Washington, DC 20005 UNITED STATES tmdocketdc@kenyon.com, wmerone@andrewskurthkenyon.com Phone:202-662-2700
----------------------	--

### Applicant Information

Application No	87233504	Publication date	04/18/2017
Opposition Filing Date	06/12/2017	Opposition Period Ends	06/17/2017
Applicant	Bronzed Barbie, LLC 13423 Blanco Road #293 San Antonio, TX 78216 UNITED STATES		

### Goods/Services Affected by Opposition

Class 044. First Use: 2016/11/02 First Use In Commerce: 2016/11/02  
All goods and services in the class are opposed, namely: airbrush skin tanning services for humans for cosmetic purposes

### Grounds for Opposition


Priority and likelihood of confusion	Trademark Act Section 2(d)
Dilution by blurring	Trademark Act Sections 2 and 43(c)
Dilution by tarnishment	Trademark Act Sections 2 and 43(c)

### Marks Cited by Opposer as Basis for Opposition

U.S. Registration No.	1041587	Application Date	05/12/1975
Registration Date	06/22/1976	Foreign Priority Date	NONE

Word Mark	BARBIE
Design Mark	
Description of Mark	NONE
Goods/Services	Class 003. First use: First Use: 1975/01/31 First Use In Commerce: 1975/01/31 TOILET SOAP, BUBBLE BATH, [BATH BEADS, ] MOISTURIZING LOTION, COLOGNE AND HAIR SHAMPOO

U.S. Registration No.	1775637	Application Date	03/25/1991
Registration Date	06/08/1993	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 003. First use: First Use: 1992/01/09 First Use In Commerce: 1992/01/09 cosmetics for use by little girls; namely, eyeshadow, lipstick, lip gloss, perfume, cologne, nail polish, blush, emery boards, and cosmetic sponges Class 021. First use: First Use: 1992/01/09 First Use In Commerce: 1992/01/09 powder puffs, and accessories therefor		

U.S. Registration No.	1795564	Application Date	03/25/1991
Registration Date	09/28/1993	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 005. First use: First Use: 1992/01/01 First Use In Commerce: 1992/01/01 bandages for skin wounds		

U.S. Registration No.	772298	Application Date	10/28/1963
Registration Date	06/30/1964	Foreign Priority Date	NONE


Word Mark	BARBIE
Design Mark	
Description of Mark	NONE
Goods/Services	Class 014. First use: First Use: 1963/04/03 First Use In Commerce: 1963/04/17 Time Pieces, Specifically Wrist Watches

U.S. Registration No.	1773571	Application Date	03/25/1991
Registration Date	05/25/1993	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 014. First use: First Use: 1991/01/01 First Use In Commerce: 1991/01/01 jewelry; namely, earrings, bracelets, necklaces, charms		

U.S. Registration No.	1769285	Application Date	03/25/1991
Registration Date	05/04/1993	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 016. First use: First Use: 1992/01/09 First Use In Commerce: 1992/01/09 facial tissues and stickers for fingernails		

U.S. Registration No.	1946918	Application Date	02/15/1995
Registration Date	01/09/1996	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 016. First use: First Use: 1995/02/01 First Use In Commerce: 1995/02/01 greeting cards		


U.S. Registration No.	768331	Application Date	08/30/1962
Registration Date	04/21/1964	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 018. First use: First Use: 1960/10/16 First Use In Commerce: 1960/10/16		

	Doll Case, [Record Tote Case,] Trunk, and Wallet		
U.S. Registration No.	1795876	Application Date	03/25/1991
Registration Date	09/28/1993	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 018. First use: First Use: 1991/04/01 First Use In Commerce: 1991/04/01 purses and cosmetic cases		
U.S. Registration No.	813733	Application Date	01/28/1965
Registration Date	08/30/1966	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 020. First use: First Use: 1962/02/00 First Use In Commerce: 1962/02/00 INSULATING CONTAINERS, SPECIFICALLY, VACUUM BOTTLES FOR PRE-SERVING FOOD AND DRINKS		
U.S. Registration No.	816601	Application Date	02/04/1965
Registration Date	10/11/1966	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 020. First use: First Use: 1962/06/01 First Use In Commerce: 1962/06/01 HAND MIRRORS		
U.S. Registration No.	814091	Application Date	02/04/1965
Registration Date	08/30/1966	Foreign Priority Date	NONE
Word Mark	BARBIE		

Design Mark	
Description of Mark	NONE
Goods/Services	Class 021. First use: First Use: 1962/06/01 First Use In Commerce: 1962/06/01 VANITY SETS AND DRESSER SETS, COMPRISING MIRRORS, BRUSHES, COMBS, COMPACTS, AND LIPSTICK CASES, FOR USE BY CHILDREN

U.S. Registration No.	817200	Application Date	02/04/1965
Registration Date	10/25/1966	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class U002 (International Class 006, 013, 014, 015, 016, 018, 020, 021, 022, 034). First use: First Use: 1961/00/00 First Use In Commerce: 1961/00/00 PLASTIC WARE AND TEA SETS, SPECIFICALLY PLATES, SAUCERS, CUPS, POTS, PITCHERS, [ AND EATING UTENSILS ] FOR USE BY CHILDREN IN THE CONSUMPTION OF FOOD AND DRINK		

U.S. Registration No.	1000125	Application Date	04/22/1974
Registration Date	12/24/1974	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 025. First use: First Use: 1972/03/08 First Use In Commerce: 1972/03/08 HALLOWEEN COSTUMES AND MASKS		

U.S. Registration No.	1693139	Application Date	07/23/1990
Registration Date	06/09/1992	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			

Description of Mark	NONE
Goods/Services	Class 025. First use: First Use: 1963/12/31 First Use In Commerce: 1963/12/31 jackets, sweatshirts, T-shirts, jeans, skirts

U.S. Registration No.	1754535	Application Date	07/23/1990
Registration Date	02/23/1993	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 025. First use: First Use: 1990/10/01 First Use In Commerce: 1990/10/01 dresses, shorts, T-shirts, blouses, skirts, pants, leggings, leggings with skirts attached		

U.S. Registration No.	2040801	Application Date	06/11/1996
Registration Date	02/25/1997	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 025. First use: First Use: 1990/04/00 First Use In Commerce: 1990/04/00 shoes		

U.S. Registration No.	689055	Application Date	07/02/1958
Registration Date	12/01/1959	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 028. First use: First Use: 1958/05/09 First Use In Commerce: 1958/05/09 DOLL		

U.S. Registration No.	741208	Application Date	10/18/1960
Registration Date	11/27/1962	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 028. First use: First Use: 1960/09/02 First Use In Commerce: 1960/09/02 Accessories for Doll Clothes		


U.S. Registration No.	768397	Application Date	04/16/1963
Registration Date	04/21/1964	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 028. First use: First Use: 1959/04/17 First Use In Commerce: 1959/04/17 Doll Clothes and Doll Accessories		


U.S. Registration No.	810106	Application Date	01/25/1965
Registration Date	06/21/1966	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 028. First use: First Use: 1961/04/01 First Use In Commerce: 1961/04/01 TOY FURNITURE SPECIFICALLY BED, WARDROBE, CHIFFOROB, VAN-ITY, AND CHEST		

U.S. Registration No.	1300766	Application Date	12/05/1983
Registration Date	10/16/1984	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 028. First use: First Use: 1983/08/18 First Use In Commerce: 1983/08/18 Toy Vehicles		

U.S. Registration No.	1746477	Application Date	06/21/1990
Registration Date	01/12/1993	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 028. First use: First Use: 1990/06/25 First Use In Commerce: 1990/06/25 playset; namely, doll furniture, doll furniture accessories, and food making accessories		

U.S. Registration No.	3287023	Application Date	10/24/2005
Registration Date	08/28/2007	Foreign Priority Date	NONE

Word Mark	BARBIE
Design Mark	
Description of Mark	NONE
Goods/Services	Class 028. First use: First Use: 1960/00/00 First Use In Commerce: 1960/00/00 FULL LINE OF DOLLS, DOLL CLOTHING AND DOLL ACCESSORIES

U.S. Registration No.	2410087	Application Date	05/03/1999
Registration Date	12/05/2000	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 035. First use: First Use: 1991/00/00 First Use In Commerce: 1991/00/00 RETAIL STORE DEPARTMENTS FEATURING CONSUMERS PRODUCTS, NAMELY, CLOTHING, SPORTING GOODS, [ COMPUTER SOFTWARE, STATIONERY, ] KEY RINGS, [ LUNCH BOXES, CHRISTMASORNAMENTS, ] COLLECTIBLES, JEWELRY, [ LINENS, TOWELS, ] HOUSEWARES, GIFT ITEMS AND A FULL LINE OF TOYS		

U.S. Registration No.	2588845	Application Date	12/18/1998
Registration Date	07/02/2002	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 041. First use: First Use: 1998/11/00 First Use In Commerce: 1998/11/00 ENTERTAINMENT SERVICES, NAMELY, LIVE APPEARANCES BY A COSTUMED CHARACTER		



U.S. Registration No.	2203306	Application Date	05/06/1997
Registration Date	11/10/1998	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 021. First use: First Use: 1962/06/01 First Use In Commerce: 1962/06/01 hair brushes, hair combs and nail brushes Class 026. First use: First Use: 1991/11/26 First Use In Commerce: 1991/11/26 hair bands and hair ribbons		

U.S. Registration No.	2469935	Application Date	04/23/1997
Registration Date	07/17/2001	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 009. First use: First Use: 1994/05/00 First Use In Commerce: 1994/05/00 [ electric switch plates, computer mouse pads, ] radios, sunglasses; electric night lights, [ bicycle lights ] Class 011. First use: First Use: 2000/04/00 First Use In Commerce: 2000/04/00 electric night lights, [ bicycle lights] Class 027. First use: First Use: 1997/00/00 First Use In Commerce: 1997/00/00 [ plastic wall coverings, ] vinyl wall coverings, [ plastic bath mats ] and wall paper		

U.S. Registration No.	814995	Application Date	01/07/1965
Registration Date	09/13/1966	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class U037 (International Class 016, 026, 027). First use: First Use: 1962/01/00 First Use In Commerce: 1962/01/00 [SERIES OF BOOKS-NAMELY, AUTOGRAPH BOOKS, DIARIES, NOTE-BOOKS, AND SCRAPBOOKS] Class U038 (International Class 009, 016, 028). First use: First Use: 1962/01/00 First Use In Commerce: 1962/01/00 SERIES OF BOOKS AND PRINTED ARTICLES-NAMELY, [DICTIONARIES,] STORYBOOKS, COLORING BOOKS, ACTIVITY BOOKS, PAINTING BOOKS, [ NOVELTY AND TOY BOOKS, PRINTED CUT-OUTS, PRINTED PUNCH-OUTS] AND PRINTED PUZZLES		

U.S. Registration No.	2495195	Application Date	03/16/1995
-----------------------	---------	------------------	------------

Registration Date	10/09/2001	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 009. First use: First Use: 1961/00/00 First Use In Commerce: 1961/00/00 [Prerecorded computer storytelling software ] [ ; prerecorded audio and video musical, storytelling and/or game recordings in cassette form; screensaver programs; software featuring directories of toys, all for informational, educational and entertainment uses ]</p> <p>Class 028. First use: First Use: 1996/09/00 First Use In Commerce: 1996/09/00 [ Coin-operated arcade games, ] prerecorded computer game cartridges, [ cassettes, ] [ cards, ] discs and programs for [ informational, educational and ] entertainment uses [; electronic hand-held games; computer game joysticks, ] [ adapters, connectors and controllers for use with prerecorded computer software, audioand video cassettes, CD-ROM, game cartridges, ] [ game cassettes, ] [game cardsand game discs, all for informational, educational and entertainment uses ]</p> <p>Class 041. First use: First Use: 1996/09/00 First Use In Commerce: 1996/09/00 Providing educational and entertainmentservices via a global computer network web site featuring stories, games, and directories for toys and games, intended for adults and children</p>		

U.S. Registration No.	2151953	Application Date	11/12/1996
Registration Date	04/21/1998	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 035. First use: First Use: 1996/10/21 First Use In Commerce: 1996/10/21 on-line retail store services featuringtoys</p> <p>Class 042. First use: First Use: 1996/10/21 First Use In Commerce: 1996/10/21 providing information over a global comoputer network featuring games, stories,directories for toys and games, toy collectibles, and chat sessions</p>		


U.S. Registration No.	2678386	Application Date	10/08/1997
Registration Date	01/21/2003	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 003. First use: First Use: 1998/06/00 First Use In Commerce: 1998/06/00 [TOILET SOAPS, BUBBLE BATHS, BATH BEADS, MOISTURIZING LOTIONS, COLOGNES, HAIR SHAMPOOS; COSMETICS FOR USE BY LITTLE GIRLS, NAMELY, EYE SHADOWS, LIPSTICKS, LIP GLOSSES, PERFUMES, COLOGNES, NAIL POLISHES, BLUSHES, EMERY BOARDS;] BATH GELS, [BABY POWDER,] BODY LOTIONS, HAIR CONDITIONERS, SKIN CREAMS,</p>		

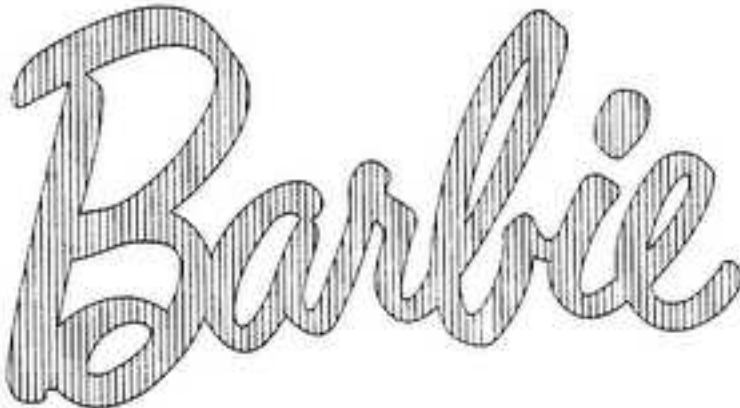
	<p>EYE MAKEUP, EYE PENCILS,[ HAND CREAMS,] MAKEUP,[ SKIN SOAPS,LIQUID SOAPS FOR HANDS, FACE AND BODY, SUN BLOCKS, EAU DE TOILETTE,] TOOTHPASTES, [COMPACTS CONTAINING MAKEUP, SCENTED BODY SPRAYS, SUN SCREENS, BODY GLITTERS,HAIR GELS]</p> <p>Class 006. First use: First Use: 1999/12/00 First Use In Commerce: 1999/12/00 METAL KEY RINGS [, METAL DECORATIVE BOXES, METAL PIGGY BANKS]</p> <p>Class 008. First use: First Use: 1995/03/00 First Use In Commerce: 1995/03/00 [SHOVELS, TABLEWARE NAMELY, KNIVES, FORKS AND SPOONS, SCIS-SORS]</p> <p>Class 009. First use: First Use: 2000/03/00 First Use In Commerce: 2000/03/00 [CALCULATORS, DISPOSABLE CAMERAS,] EYEGLASS CASES, RADIOS INCORPORATING CLOCKS,DECORATIVE MAGNETS, TELEPHONES, [ELECTRIC OUTLET COVERS,] HEADPHONES, BICYCLE HELMETS, [ELECTRIC SWITCH PLATES, RADIOS,SUNGLASSES, KALEIDOSCOPES,] MUSICAL, AUDIO AND VIDEO SOUND RECORDINGS FEATURINGGAMES AND STORYTELLING; [AUDIO AND VIDEO CASSETTES,] [CD-ROMS TAPES AND DISCS ALL FEATURING MUSIC, GAMES AND STORYTELLING,] [COMPUTER MOUSE, ]COMPUTER MOUSE PADS, SCREENSAVER PROGRAMS, [COMPUTER GAMEJOYSTICKS,] VIDEO GAME CARTRIDGES, INTERACTIVE VIDEO GAME PROGRAMS, INTERACTIVEMULTIMEDIA COMPUTER GAME PROGRAMS, COMPUTER GAME CARTRIDGES; [PRERECORDED COMPUTER STORYTELLING SOFTWARE, COMPUTER SOFTWARE, COMPUTER PROGRAMS AND CD-ROMS ALL FEATURING ACTIVITIES, EDUCATIONAL INFORMATION, STORIES, GAMES, AND THE LIKE FOR CHILDREN AND YOUNG ADULTS, AND FOR CREATING GRAPHIC DESIGNS FOR CREATING PRINTEDMATERIALS SUCH AS GREETINGS CARDS, BANNERS, CALENDARS, AND THE LIKE, AND FOR DESIGNING FASHION CLOTHING FOR DOLLS FOR USE BY NON-PROFESSIONALS, CD-ROMS FEATURING DIRECTORIES OF DOLLS AND TOY RELATED COLLECTIBLES FOR COLLECTORS]</p> <p>Class 011. First use: First Use: 1998/12/00 First Use In Commerce: 1998/12/00 [ELECTRIC LIGHTING FIXTURES,][ HAND-HELD ELECTRIC HAIR DRYERS,] [ELECTRIC NIGHTLIGHTS,] [BICYCLE LIGHTS,] CEILING FANS[, LAMP SHADES, LAMPS] [, FLASHLIGHTS, BICYCLE REFLECTORS]</p> <p>Class 012. First use: First Use: 1999/12/00 First Use In Commerce: 1999/12/00 BICYCLES, BICYCLE BELLS, TRICYCLES [, WHEEL CHAIRS, AUTOMOBILE WINDSHIELD SUNSHADES]</p> <p>Class 014. First use: First Use: 2000/12/00 First Use In Commerce: 2000/12/00 CLOCKS, [ANKLE BRACELETS, BROOCHES, ] [EAR CLIPS, TIE CLIPS,] COSTUME JEWELRY,RINGS BEING JEWELRY, [PINS BEING JEWELRY,] EARRINGS, BRACELETS, NECKLACES AND CHARMS, LOCKETS, WATCHES [, JEWELRY MAKING BEAD KITS COMPRISED OF BEADS,] [NEEDLES, CLASPS AND CORDING]</p> <p>Class 016. First use: First Use: 1993/03/00 First Use In Commerce: 1993/03/00 PHOTOGRAPH ALBUMS,[ CARDBOARD PHOTOGRAPH BOXES, PAPER BOXES, DRAWER LINER PAPER,] NOTE CARDS, [AGENDA BOOKS; DAILY, DESK TOP AND PERSONAL PLANNERS,] PENCIL CASES, [ARTS AND CRAFTS PAINT KITS,] PAPER PARTY BAGS, [BOOK COVERS, BOOK ENDS, BOOK MARKS,] ADDRESS BOOKS, LOOSE LEAF BINDERS, [STATIONERY BOXES, PAINT BRUSHES,] CALENDARS, POST CARDS, [TRADING CARDS, TRIVIA CARDS, CHALK,] PAPER TABLE CLOTHS,COMPOSITION BOOKS, CONFETTI, [CRAFT PAPER,] CRAYONS, CREPE PAPER,[ DECALS,] PAPER PARTY DECORATIONS, [DESK SETS,] ERASERS, SERIES OF FICTION BOOKS, GIFT CARDS,GIFT WRAPPING PAPER, MARKERS, PAPER NAPKINS, NOTE PADS, [PAINTING SETS,] PAPER PARTY HATS, PEN AND PENCIL HOLDERS, PENCIL SHARPENERS, DECORATIVE PENCIL TOP ORNA-</p>
--	--

	<p>MENTS, PENCILS, PENS, PLAYING CARDS, POSTERS, BOOKS IN THE FIELD OF COLLECTIBLES, NAMELY, DOLLS, DOLL CLOTHING AND DOLL ACCESSORIES, DRAWING RULERS, RUBBER STAMPS, STAMP PADS, [STATIONERY,] STICKERS, STICKER BOOKS, FOLDERS, LUNCH BAGS, PAPER GIFT BAGS, [PLASTIC PLACE MATS,] PRINTED INVITATIONS, PERSONAL JOURNALS, [TALKING CHILDREN'S BOOKS,] TEMPORARY TATTOOS, [TRADING CARD MILK BOTTLE CAPS,] WRITING INSTRUMENTS, [BOOKS OF GAMES,] PAPERBANNERS, [COASTERS MADE OF PAPER,] MEMOPADS, [GREETING CARDS, FACIAL TISSUES AND STICKERS FOR FINGERNAILS; AUTOGRAPH BOOKS, DIARIES, NOTEBOOKS, AND SCRAPBOOKS, COLORING BOOKS, ACTIVITY BOOKS,] MAGAZINES FOR TEENAGERS AND CHILDREN</p> <p>Class 018. First use: First Use: 2000/12/00 First Use In Commerce: 2000/12/00  BACKPACKS, BEACH BAGS, GYM BAGS, OVERNIGHT BAGS, COIN PURSES, DUFFEL BAGS, HANDBAGS, KEY CASES, LUGGAGE, SUITCASES, UMBRELLAS, [FANNY PACKS, WAIST PACKS,] LIPSTICK HOLDERS; [PURSES, COSMETIC CASES SOLD EMPTY,] LUGGAGE TRUNKS, WALLETES [, HAT BOXES] [, TRAIN CASES]</p> <p>Class 020. First use: First Use: 2000/08/00 First Use In Commerce: 2000/08/00  SLEEPING BAGS, PLASTIC CAKE DECORATIONS, [TOY CHESTS,] [BED FRAMES,] PICTURE FRAMES, [DECORATIVE GLITTER,] JEWELRY BOXES NOT OF METAL, [DECORATIVE MOBILES,] PILLOWS, [DESKS, BEDROOM FURNITURE, SNOW GLOBES,] NON-METAL KEY RINGS [, HAND MIRRORS]</p> <p>Class 021. First use: First Use: 1995/06/00 First Use In Commerce: 1995/06/00  PLATES, CUPS AND BOWLS MADE OF MELAMINE, [NON-METAL PIGGY BANKS,] WASTEPAPER BASKETS, BOWLS, LUNCH BOXES, [COSMETIC BRUSHES, SUN CATCHERS, COOKIE CUTTERS,] PAPER CUPS, DECORATIVE PLATES, PORCELAIN FIGURINES, PAPER PLATES, PLASTIC CUPS, [COMMEMORATIVE PLATES,] [VACUUM BOTTLES, VASES,] [WIND CHIMES,] [COOKIE JARS,] THERMAL INSULATED TOTE BAGS AND CONTAINERS FOR FOOD OR BEVERAGES, TOOTHBRUSHES, CAKEMOLDS, [TOOTHBRUSH HOLDERS,] [WATERING CANS,] [BASINS, PAILS, COASTERS NOT OF PAPER AND NOT BEING OF TABLE LINEN, SOAP DISHES, SOAP DISPENSERS,] DRINKING GLASSES, MUGS, [TEA SETS FEATURING PLATES, SAUCERS, CUPS, POTS AND PITCHERS; VANITY SETS AND DRESSES SETS, COMPRISING MIRRORS, BRUSHES, COMBS, EMPTY COMPACTS AND LIPSTICK CASES FOR USE BY CHILDREN, SOLD ASA UNIT; POWDER PUFFS; COSMETIC SPONGES FOR USE IN APPLYING OR REMOVING MAKEUP; HAIR BRUSHES, HAIR COMBS, NAIL BRUSHES, NON-METAL DECORATIVE BOXES, FITTED PICNIC BASKETS]</p> <p>Class 024. First use: First Use: 1998/03/00 First Use In Commerce: 1998/03/00  [CLOTH BANNERS, FABRIC BATH MATS,] BATHLINEN, BED LINEN, BED SHEETS, BED SPREADS, BED BLANKETS, [BED CANOPIES,] PILLOWCASES, [CLOTH FLAGS,] WASH CLOTHS, [TABLE CLOTHS NOT OF PAPER,] COMFORTERS, [DUVET COVERS, CRIB BUMPERS, CRIB SHEETS,] CURTAINS, [DRAPERIES,] DUST RUFFLES, PILLOW SHAMS, [TEXTILE AND LINEN PLACE MATS, QUILTS,] BATH TOWELS, BEACH TOWELS, [KITCHEN TOWELS, TEXTILE WALL HANGINGS, SHOWER CURTAINS, SWAGS, FABRIC VALANCES]</p> <p>Class 025. First use: First Use: 1988/06/00 First Use In Commerce: 1988/06/00  BATHING SUITS, BATHROBES, BEACH COVER-UPS, BELTS, [BERETS,] BOOTS, CARDIGANS, COATS, RAIN COATS, GLOVES, NIGHT GOWNS, HATS, HEAD BANDS, HEADWEAR, [HOSIERY,] [JUMPERS,] [KNEE HIGHS,] LEOTARDS, MITTENS, [NECKTIES,] NIGHT SHIRTS, OVERALLS, PAJAMAS, PANTIES, [PANTYHOSE,] SANDALS, SCARVES, SHIRTS, SLIPPERS, [SLIPS,] SOCKS, [STOCKINGS,] [SUSPENDERS,] SWEATERS, TANK TOPS, THERMAL UNDERWEAR, TIGHTS, TURTLENECKS, UNDERWEAR, VESTS,</p>
--	--


	<p>CAPS, SKORTS, [BLANKET SLEEPERS,] MITTEN CLIPS, EARMUFFS, SWIMSUITS, SWIMSUIT COVERS,[ JACKETS, SWEATSHIRTS, T-SHIRTS, JEANS, SKIRTS;] HALLOWEEN COSTUMES AND MASKS; DRESSES, SHORTS, T-SHIRTS, BLOUSES, SKIRTS,[ PANTS, LEGGINGS WITH SKIRT ATTACHED; SHOES]</p> <p>Class 026. First use: First Use: 2000/12/00 First Use In Commerce: 2000/12/00  BARRETTES, HAIR BOWS, [BOWS FOR GIFT WRAPPING, TEA COSIES, HOUSEHOLD APPLIANCE COVERS,] ELASTIC RIBBONS, [FABRIC APPLIQUES,] PONYTAIL HOLDERS, SHOE LACES, ORNAMENTAL NOVELTY PINS AND BUTTONS, [HAIR BANDS AND HAIR RIBBONS]</p> <p>Class 027. First use: First Use: 1998/06/00 First Use In Commerce: 1998/06/00  RUGS [, DOOR MATS, FLOOR MATS FOR VEHICLES,] PLASTIC WALL COVERINGS [, VINYL WALL COVERINGS, BATH MATS AND WALL PAPER]</p> <p>Class 028. First use: First Use: 1998/12/00 First Use In Commerce: 1998/12/00  ACTION FIGURES AND ACCESSORIES THEREFOR, STUFFED TOY ANIMALS, TOY AIRPLANES, BALLOONS, TOY BAKEWARE AND COOKWARE, SPORTBALLS, TOY BANKS, BATH TOYS, [BEAN BAGS, TOY BUILDING BLOCKS,] PLAY WANDS, MUSIC BOX TOYS, BUBBLE MAKING WAND AND SOLUTION SETS, CARD GAMES, CHRISTMAS TREE ORNAMENTS,[ CHRISTMAS TREE SKIRTS,] CHILDREN'S PLAY COSMETICS, PARTY FAVORS IN THE NATURE OF CRACKERS OR NOISEMAKERS, [TOY MOBILES, FLYING DISCS,] PORCELAIN DOLLS,PAPER DOLLS, PARTY FAVORS IN THE NATUREOF SMALL TOYS, ICE SKATES, JIGSAW PUZZLES, JUMP ROPES,[ KITES,] MUSICAL TOYS, PLAY SWIMMING POOLS, PLUSH TOYS, [PUPPETS,] RIDE-ON TOYS, MANIPULATIVE PUZZLES, ROLLER SKATES, WATER-SQUIRTING TOYS, YO-YOS, [FOOTBAGS USED IN A KICKING GAME, ADULT AND CHILDREN PARTY GAMES, CHRISTMAS STOCKINGS,] COLLECTIBLE TOY FIGURES, DOLL HOUSES, DRAWING TOYS, IN-LINE SKATES, PLAY TENTS, PLAY HOUSES, RADIO CONTROLLED TOY VEHICLES, [SAND TOYS, SAND BOX TOYS,] TALKING TOYS; [SLIDE PUZZLES, PADDLEBALL GAMES;] SWIM GOGGLES, SWIM VESTS FOR FLOATATION FOR RECREATIONAL USE, DOLLS; PLAYSETS, NAMELY, DOLL FURNITURE, DOLL FURNITURE ACCESSORIES, TOY FOOD MAKINGACCESSORIES, NAMELY, BOWLS, SPOONS, BLENDERS, OVENS, MIXERS AND THE LIKE; DOLL CLOTHES AND DOLL ACCESSORIES; BOARD GAMES; ACCESSORIES FOR DOLL CLOTHES, TOY FURNITURE, SPECIFICALLY BEDS, WARDROBES, [CHIFFOROBES,] VANITIES AND CHESTS; DOLL CASES; TOY VEHICLES; [OUTDOOR PLAY EQUIPMENT, NAMELY, PLAY SLIDES AND SWINGS, SAND SANDBOXES;] [COIN-OPERATED ARCADE GAMES,] ELECTRONIC HAND-HELD GAMES [, PLASTIC TOY HOOPS, PINWHEELS]</p> <p>Class 030. First use: First Use: 1995/12/00 First Use In Commerce: 1995/12/00  EDIBLE CAKE DECORATIONS, CANDY, [BREAKFAST CEREALS,] [CHEWING GUM, ]COOKIES, [MACARONI AND CHEESE, BAKERY GOODS,] CHOCOLATE CANDY</p>
--	---

U.S. Registration No.	2087842	Application Date	10/09/1996
Registration Date	08/12/1997	Foreign Priority Date	NONE
Word Mark	BARBIE		

Design Mark	
Description of Mark	NONE
Goods/Services	Class 028. First use: First Use: 1995/04/20 First Use In Commerce: 1995/04/20 doll, doll clothing and doll accessories

U.S. Registration No.	2639971	Application Date	07/09/1998
Registration Date	10/22/2002	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 025. First use: First Use: 2002/05/12 First Use In Commerce: 2002/05/12 [ after ski boots, anoraks, athletic uniforms, bandannas, jackets, sweat-shirts,sweat pants,] T-shirts [, jeans, skirts, Halloween costumes and masks; dresses, shorts, blouses, pants, leggings with skirt attached; shoes, bathing suits, bathrobes, beach cover-ups, belts, berets,boots, cardigans, coats, rain coats, gloves, night gowns, hats, head bands, headwear, hosiery, jumpers, knee highs, leotards, mittens, neckties, night shirts, overalls, pajamas, panties, panty-hose, sandals, scarves, shirts, slippers, slips, socks, stockings, suspenders, sweaters, tank tops, thermal underwear, tights, turtlenecks, underwear, vests,		

	caps, skorts, blanket sleepers, earmuffs, swimsuits, swimsuit cover ups] Class 028. First use: First Use: 2000/07/13 First Use In Commerce: 2000/07/13 dolls, doll clothing, doll accessories [, doll houses and doll furniture, boardgames, card games, role playing games, children's play cosmetics, swim masks, elbow, wrist and knee pads for athletic use, swim fins, hand held units for playing electronic games, swim goggles, jump ropes, inflatable swimming pools, ride-on toys, ice skates, roller skates, inline skates, yo-yos, flying discs, balloons, plastic balls, beach balls, toys candydispensers, card games, cases for play accessories, toy vehicles, high bounce balls, kites, costume masks, jigsaw puzzles, remote controlled vehicles, three-dimensional puzzles, toy banks, plush toys, Christmas tree ornaments, water squirting toys, craft kits comprised of beads,toy jewelry making kits, swimming aids,namely, pool rings and arm floats for recreational use, toy snow globes, and toy toiletry sets ]
--	---

U.S. Registration No.	2150392	Application Date	11/12/1996
Registration Date	04/14/1998	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 035. First use: First Use: 1996/10/21 First Use In Commerce: 1996/10/21 online retail store services featuring toys Class 042. First use: First Use: 1996/10/21 First Use In Commerce: 1996/10/21 providing information about dolls and collectibles via computer		

U.S. Registration No.	3887194	Application Date	04/22/2009
Registration Date	12/07/2010	Foreign Priority Date	NONE
Word Mark	BARBIE BASICS		

Design Mark	<b>BARBIE BASICS</b>
Description of Mark	NONE
Goods/Services	Class 028. First use: First Use: 2009/09/29 First Use In Commerce: 2009/09/29 TOYS, GAMES AND PLAYTHINGS, NAMELY, DOLLS, DOLL CLOTHING AND DOLL ACCESSORIES

U.S. Registration No.	3083593	Application Date	03/12/2004
Registration Date	04/18/2006	Foreign Priority Date	NONE
Word Mark	BARBIE COLLECTOR		
Design Mark	<b>BARBIE COLLECTOR</b>		
Description of Mark	NONE		
Goods/Services	<p>Class 028. First use: First Use: 2004/07/00 First Use In Commerce: 2004/07/00 TOYS, GAMES AND PLAYTHINGS, NAMELY, DOLLS, DOLL CLOTHING AND DOLL ACCESSORIES, [ MOLDED PLASTIC TOY FIGURINES, WATER GLOBES, ARTIFICIAL CHRISTMAS TREES, CHRISTAMAS TREE ORNAMENTS ]</p> <p>Class 041. First use: First Use: 2004/05/17 First Use In Commerce: 2004/05/17 PROVIDING EDUCATIONAL AND ENTERTAINMENTSERVICES VIA A GLOBAL COMPUTER NETWORK WEB SITE FEATURING [ GAMES, PRODUCT TRIVIA, ACTIVITIES AND ] PRODUCT INFORMATIONINTENDED FOR CONSUMERS OF ALL AGES</p>		

U.S. Registration No.	4272482	Application Date	10/13/2008
Registration Date	01/08/2013	Foreign Priority Date	NONE
Word Mark	BARBIE ENTERTAINMENT		



Design Mark	<b>BARBIE ENTERTAINMENT</b>
Description of Mark	NONE
Goods/Services	Class 009. First use: First Use: 2011/12/31 First Use In Commerce: 2011/12/31 PRE-RECORDED MEDIA, NAMELY, DVDS FEATURING ENTERTAINMENT FOR CHILDREN AND TEENS Class 041. First use: First Use: 2011/12/31 First Use In Commerce: 2011/12/31 ENTERTAINMENT SERVICES, NAMELY, THE PRODUCTION AND DISTRIBUTION OF MOTION PICTURE FILMS AND TELEVISION PROGRAMS

U.S. Registration No.	4572684	Application Date	01/07/2011
Registration Date	07/22/2014	Foreign Priority Date	NONE
Word Mark	BARBIE		
Design Mark	<b>BARBIE</b>		
Description of Mark	NONE		
Goods/Services	Class 043. First use: First Use: 2014/02/14 First Use In Commerce: 2014/02/14 RESTAURANT SERVICES, CAFE SERVICES		

U.S. Registration No.	4683609	Application Date	12/03/2013
Registration Date	02/10/2015	Foreign Priority Date	NONE
Word Mark	BARBIE LIFE		

Design Mark	<b>BARBIE LIFE</b>
Description of Mark	NONE
Goods/Services	Class 009. First use: First Use: 2014/03/10 First Use In Commerce: 2014/03/10 COMPUTER APPLICATION SOFTWARE FOR MOBILE PHONES AND MOBILE DEVICES, NAMELY, SOFTWARE USED TO ACCESS WEBSITE CONTENT, NON-DOWNLOADABLE MOVIES AND VIDEOS, NON-DOWNLOADABLE MUSIC, COMPUTER GAMES AND DIGITAL WALLPAPER

U.S. Registration No.	4626002	Application Date	08/15/2013
Registration Date	10/21/2014	Foreign Priority Date	NONE
Word Mark	BARBIE STYLE		
Design Mark	<b>BARBIE STYLE</b>		
Description of Mark	NONE		
Goods/Services	Class 028. First use: First Use: 2014/08/11 First Use In Commerce: 2014/08/11 DOLLS, DOLL CLOTHING AND DOLL ACCESSORIES		

U.S. Registration No.	4151281	Application Date	03/07/2011
Registration Date	05/29/2012	Foreign Priority Date	NONE
Word Mark	BARBIE FAIRY SECRET		

Design Mark	<b>BARBIE FAIRY SECRET</b>
Description of Mark	NONE
Goods/Services	Class 009. First use: First Use: 2011/05/04 First Use In Commerce: 2011/05/04 VIDEO GAME SOFTWARE AND VIDEO GAME APPLICATION SOFTWARE FOR MOBILE DEVICES AND TABLET COMPUTERS



U.S. Registration No.	4306182	Application Date	11/08/2011
Registration Date	03/19/2013	Foreign Priority Date	NONE
Word Mark	BARBIE IN THE PINK SHOES		
Design Mark	<b>BARBIE IN THE PINK SHOES</b>		
Description of Mark	NONE		
Goods/Services	Class 028. First use: First Use: 2012/12/05 First Use In Commerce: 2012/12/05 DOLLS, DOLL CLOTHING AND DOLL ACCESSORIES		

U.S. Registration No.	4339722	Application Date	02/23/2012
Registration Date	05/21/2013	Foreign Priority Date	NONE
Word Mark	BARBIE LIFE IN THE DREAMHOUSE		

Design Mark	BARBIE LIFE IN THE DREAMHOUSE
Description of Mark	NONE
Goods/Services	Class 041. First use: First Use: 2013/02/11 First Use In Commerce: 2013/02/11 ENTERTAINMENT SERVICES, NAMELY, PROVIDING ON-GOING WEBISODES FEATURING ANIMATION VIA A GLOBAL COMPUTER NETWORK

U.S. Registration No.	4429518	Application Date	04/30/2012
Registration Date	11/05/2013	Foreign Priority Date	NONE
Word Mark	BARBIE MARIPOSA & THE FAIRY PRINCESS		
Design Mark	BARBIE MARIPOSA & THE FAIRY PRINCESS		
Description of Mark	NONE		
Goods/Services	Class 028. First use: First Use: 2013/08/20 First Use In Commerce: 2013/08/20 DOLLS, DOLL CLOTHING AND DOLL ACCESSORIES		

U.S. Registration No.	4495483	Application Date	06/12/2012
Registration Date	03/11/2014	Foreign Priority Date	NONE
Word Mark	BARBIE THE DREAMHOUSE EXPERIENCE		
Design Mark	BARBIE THE DREAMHOUSE EXPERIENCE		
Description of Mark	NONE		
Goods/Services	Class 028. First use: First Use: 2013/05/06 First Use In Commerce: 2013/05/06 TOYS, GAMES AND PLAYTHINGS, NAMELY, DOLLS, DOLL CLOTHING AND		

	DOLL ACCESSORIES		
U.S. Registration No.	4403388	Application Date	02/18/2013
Registration Date	09/17/2013	Foreign Priority Date	NONE
Word Mark	TEAM BARBIE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 028. First use: First Use: 2012/05/09 First Use In Commerce: 2012/05/09 DOLLS, DOLL CLOTHING AND DOLL ACCESSORIES, TOY FIGURES AND ACCESSORIES THEREFOR		
U.S. Registration No.	4325862	Application Date	05/25/2012
Registration Date	04/23/2013	Foreign Priority Date	NONE
Word Mark	THE BARBIE LOOK		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 028. First use: First Use: 2013/02/11 First Use In Commerce: 2013/02/11 DOLLS, DOLL CLOTHING AND DOLL ACCESSORIES		
U.S. Registration No.	4728445	Application Date	09/03/2013
Registration Date	04/28/2015	Foreign Priority Date	NONE
Word Mark	HOUSE OF DREAMS BY BARBIE		

Design Mark	HOUSE OF DREAMS BY BARBIE
Description of Mark	NONE
Goods/Services	Class 025. First use: First Use: 2015/02/16 First Use In Commerce: 2015/02/16 LINGERIE AND SLEEPWEAR

Attachments	74151036#TMSN.png( bytes ) 74150902#TMSN.png( bytes ) 74080723#TMSN.png( bytes ) 78739456#TMSN.png( bytes ) 75696390#TMSN.png( bytes ) 75179870#TMSN.png( bytes ) 75516465#TMSN.png( bytes ) 75196987#TMSN.png( bytes ) 77719921#TMSN.png( bytes ) 78383441#TMSN.png( bytes ) 77591757#TMSN.png( bytes ) 85212683#TMSN.png( bytes ) 86134189#TMSN.png( bytes ) 86038665#TMSN.png( bytes ) 85259518#TMSN.png( bytes ) 85466846#TMSN.png( bytes ) 85550966#TMSN.png( bytes ) 85612322#TMSN.png( bytes ) 85649256#TMSN.png( bytes ) 85852472#TMSN.png( bytes ) 85635562#TMSN.png( bytes ) 86054026#TMSN.png( bytes ) Notice of Opposition -- BRONZED BARBIE.pdf(111044 bytes )
-------------	---

Signature	/William M. Merone/
Name	William M. Merone
Date	06/12/2017

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Trademark Application:

Serial No. : 87233504  
Applicant : Bronzed Barbie, LLC  
Filed : Nov. 11, 2016  
Mark : BRONZED BARBIE

Published in the *Official Gazette* of Apr. 18, 2017

MATTEL, INC.

*Opposer,*

v.

BRONZED BARBIE, LLC

*Applicant.*

Opposition No. \_\_\_\_\_

UNITED STATES PATENT AND TRADEMARK OFFICE  
Trademark Trial and Appeal Board  
P.O. Box 1451  
Alexandria, VA 22313-1451

**NOTICE OF OPPOSITION**

Opposer, Mattel, Inc. (“Mattel”), a corporation existing under the laws of the state of Delaware and having an address of 333 Continental Blvd., El Segundo, CA 90245, believing it will be damaged by registration of BRONZED BARBIE as a trademark for service in Class 44 as shown in Serial No. 87233504, opposes same.

As grounds for opposition, Mattel alleges the following, with all allegations regarding the acts of Applicant, Bronzed Barbie, LLC, made on information and belief:

1. Applicant, Bronzed Barbie, LLC, seeks to register BRONZED BARBIE as a mark in International Class 44 for “*airbrush skin tanning services for humans for cosmetic purposes*” (“the Subject Services”).
2. Applicant filed Application Serial No. 87233504 on November 11, 2016, pursuant to Section 1(a) of the Trademark Act. Applicant claims a date of first use of the mark in commerce for the Subject Services of November 2, 2016.
3. Opposer, Mattel, first used the designation “BARBIE” as a trademark in commerce in connection with “dolls” at least as early as 1959, and has since then used the BARBIE® mark and various formatives thereof as a trademark for a broad range of goods and services (collectively, the “BARBIE® Marks”).
4. From the start, Mattel’s BARBIE® brand products achieved commercial success. During the first year, approximately 300,000 BARBIE® dolls were sold. Since then, Mattel has introduced several thousand different BARBIE® items and has sold more than two *billion* BARBIE® dolls and BARBIE®-branded accessories.
5. Mattel owns all trademark rights and all other rights associated with the dolls and other goods and services offered under the family of BARBIE® Marks.



6. Mattel has vigorously protected its BARBIE® Marks over the years, including by securing numerous federal trademark registrations in a wide variety of classes.

Registrations covering the Mattel BARBIE® Marks include the following:

Trademark	Reg. No.	Reg. Date	Status	Class(es)	Goods/Services
BARBIE	1041587	22-JUN-1976	Renewed (Registered)	3	<b>INT. CL. 3</b> TOILET SOAP, BUBBLE BATH, MOISTURIZING LOTION, COLOGNE AND HAIR SHAMPOO
BARBIE	1775637	08-JUN-1993	Renewed (Registered)	3	<b>INT. CL. 3</b> COSMETICS FOR USE BY LITTLE GIRLS; NAMELY, EYESHADOW, LIPSTICK, LIP GLOSS, PERFUME, COLOGNE, NAIL POLISH, BLUSH, EMERY BOARDS, AND COSMETIC SPONGES
BARBIE	1795564	28-SEP-1993	Renewed (Registered)	5	<b>INT. CL. 5</b> BANDAGES FOR SKIN WOUNDS
BARBIE	0772298	30-JUN-1964	Renewed (Registered)	14	<b>INT. CL. 14</b> TIME PIECES, SPECIFICALLY WRIST WATCHES
BARBIE	1773571	25-MAY-1993	Renewed (Registered)	14	<b>INT. CL. 14</b> JEWELRY; NAMELY, EARRINGS, BRACELETS, NECKLACES, CHARMS
BARBIE	1769285	04-MAY-1993	Renewed (Registered)	16	<b>INT. CL. 16</b> FACIAL TISSUES AND STICKERS FOR FINGERNAILS
BARBIE	1946918	09-JAN-1996	Renewed (Registered)	16	<b>INT. CL. 16</b> GREETING CARDS
BARBIE	0768331	21-APR-1964	Renewed (Registered)	18	<b>INT. CL. 18</b> DOLL CASE, TRUNK, AND WALLET
BARBIE	1795876	28-SEP-1993	Renewed (Registered)	18	<b>INT. CL. 18</b> PURSES AND COSMETIC CASES
BARBIE	0813733	30-AUG-1966	Renewed (Registered)	20	<b>INT. CL. 20</b> INSULATING CONTAINERS, SPECIFICALLY, VACUUM BOTTLES FOR PRESERVING FOOD AND DRINKS
BARBIE	0816601	11-OCT-1966	Renewed (Registered)	20	<b>INT. CL. 20</b> HAND MIRRORS
BARBIE	0814091	30-AUG-1966	Renewed (Registered)	21	<b>INT. CL. 21</b> VANITY SETS AND DRESSER SETS, COMPRISING MIRRORS, BRUSHES, COMBS, COMPACTS, AND LIPSTICK CASES, FOR USE BY CHILDREN
BARBIE	0817200	25-OCT-1966	Renewed (Registered)	21	<b>INT. CL. 21</b> PLASTIC WARE AND TEA SETS, SPECIFICALLY PLATES, SAUCERS, CUPS, POTS, PITCHERS, AND EATING UTENSILS FOR USE BY CHILDREN IN THE CONSUMPTION OF FOOD AND DRINK
BARBIE	1000125	24-DEC-1974	Renewed	25	<b>INT. CL. 25</b> HALLOWEEN COSTUMES

Trademark	Reg. No.	Reg. Date	Status	Class(es)	Goods/Services
			(Registered)		AND MASKS
BARBIE	1693139	09-JUN-1992	Renewed (Registered)	25	<b>INT. CL. 25</b> JACKETS, SWEATSHIRTS, T-SHIRTS, JEANS, SKIRTS
BARBIE	1754535	23-FEB-1993	Renewed (Registered)	25	<b>INT. CL. 25</b> DRESSES, SHORTS, T-SHIRTS, BLOUSES, SKIRTS, PANTS, LEGGINGS, LEGGINGS WITH SKIRTS ATTACHED
BARBIE	2040801	25-FEB-1997	Renewed (Registered)	25	<b>INT. CL. 25</b> SHOES
BARBIE	0689055	01-DEC-1959	Renewed (Registered)	28	<b>INT. CL. 28</b> DOLL
BARBIE	0741208	27-NOV-1962	Renewed (Registered)	28	<b>INT. CL. 28</b> ACCESSORIES FOR DOLL CLOTHES
BARBIE	0768397	21-APR-1964	Renewed (Registered)	28	<b>INT. CL. 28</b> DOLL CLOTHES AND DOLL ACCESSORIES
BARBIE	0810106	21-JUN-1966	Renewed (Registered)	28	<b>INT. CL. 28</b> TOY FURNITURE SPECIFICALLY BED, WARDROBE, CHIFFOROB, VANITY, AND CHEST
BARBIE	1300766	16-OCT-1984	Renewed (Registered)	28	<b>INT. CL. 28</b> TOY VEHICLES
BARBIE	1746477	12-JAN-1993	Renewed (Registered)	28	<b>INT. CL. 28</b> PLAYSET; NAMELY, DOLL FURNITURE, DOLL FURNITURE ACCESSORIES, AND FOOD MAKING ACCESSORIES
BARBIE	3287023	28-AUG-2007	Registered	28	<b>INT. CL. 28</b> FULL LINE OF DOLLS, DOLL CLOTHING AND DOLL ACCESSORIES
BARBIE	2410087	05-DEC-2000	Renewed (Registered)	35	<b>INT. CL. 35</b> RETAIL STORE DEPARTMENTS FEATURING CONSUMERS PRODUCTS, NAMELY, CLOTHING, SPORTING GOODS, KEY RINGS, COLLECTIBLES, JEWELRY, HOUSEWARES, GIFT ITEMS AND A FULL LINE OF TOYS
BARBIE	2588845	02-JUL-2002	Renewed (Registered)	41	<b>INT. CL. 41</b> ENTERTAINMENT SERVICES, NAMELY, LIVE APPEARANCES BY A COSTUMED CHARACTER
BARBIE	2203306	10-NOV-1998	Renewed (Registered)	21 26	<b>INT. CL. 21</b> HAIR BRUSHES, HAIR COMBS AND NAIL BRUSHES <b>INT. CL. 26</b> HAIR BANDS AND HAIR RIBBONS
BARBIE	2469935	17-JUL-2001	Renewed (Registered)	9 11 27	<b>INT. CL. 9</b> RADIOS, SUNGLASSES; ELECTRIC NIGHT LIGHTS, <b>INT. CL. 11</b> ELECTRIC NIGHT LIGHTS <b>INT. CL. 27</b> VINYL WALL COVERINGS, AND WALL PAPER
BARBIE	0814995	13-SEP-1966	Renewed (Registered)	9, 16 28	<b>INT. CL. 9, 16, 28</b> SERIES OF BOOKS AND PRINTED ARTICLES-NAMELY,

Trademark	Reg. No.	Reg. Date	Status	Class(es)	Goods/Services
					STORYBOOKS, COLORING BOOKS, ACTIVITY BOOKS, PAINTING BOOKS, AND PRINTED PUZZLES
BARBIE	2495195	09-OCT-2001	Renewed (Registered)	28 41	<b>INT. CL. 28</b> PRERECORDED COMPUTER GAME CARTRIDGES, DISCS AND PROGRAMS FOR ENTERTAINMENT USES <b>INT. CL. 41</b> PROVIDING EDUCATIONAL AND ENTERTAINMENT SERVICES VIA A GLOBAL COMPUTER NETWORK WEB SITE FEATURING STORIES, GAMES, AND DIRECTORIES FOR TOYS AND GAMES, INTENDED FOR ADULTS AND CHILDREN
BARBIE	2151953	21-APR-1998	Renewed (Registered)	35 42	<b>INT. CL. 35</b> ON-LINE RETAIL STORE SERVICES FEATURING TOYS <b>INT. CL. 42</b> PROVIDING INFORMATION OVER A GLOBAL COMOPUTER NETWORK FEATURING GAMES, STORIES, DIRECTORIES FOR TOYS AND GAMES, TOY COLLECTIBLES, AND CHAT SESSIONS
BARBIE	2678386	21-JAN-2003	Renewed (Registered)	3 6 9 11 12 14 16 18 20 21 24 25 26 27 28 30	<b>INT. CL. 3</b> BATH GELS, BODY LOTIONS, HAIR CONDITIONERS, SKIN CREAMS, EYE MAKEUP, EYE PENCILS, MAKEUP, TOOTHPASTES, <b>INT. CL. 6</b> METAL KEY RINGS <b>INT. CL. 9</b> EYEGLASS CASES, RADIOS INCORPORATING CLOCKS, DECORATIVE MAGNETS, TELEPHONES, HEADPHONES, BICYCLE HELMETS, MUSICAL, AUDIO AND VIDEO SOUND RECORDINGS FEATURING GAMES AND STORYTELLING; COMPUTER MOUSE PADS, SCREENSAVER PROGRAMS, VIDEO GAME CARTRIDGES, INTERACTIVE VIDEO GAME PROGRAMS, INTERACTIVE MULTIMEDIA COMPUTER GAME PROGRAMS, COMPUTER GAME CARTRIDGES; <b>INT. CL. 11</b> CEILING FANS <b>INT. CL. 12</b> BICYCLES, BICYCLE BELLS, TRICYCLES <b>INT. CL. 14</b> CLOCKS, COSTUME JEWELRY, RINGS BEING JEWELRY, EARRINGS, BRACELETS, NECKLACES AND CHARMS, LOCKETS, WATCHES <b>INT. CL. 16</b> PHOTOGRAPH ALBUMS, NOTE CARDS, PENCIL CASES, PAPER PARTY BAGS, ADDRESS BOOKS, LOOSE LEAF BINDERS, CALENDARS, POST CARDS, PAPER TABLE CLOTHS,

Trademark	Reg. No.	Reg. Date	Status	Class(es)	Goods/Services
					<p>COMPOSITION BOOKS, CONFETTI, CRAYONS, CREPE PAPER, PAPER PARTY DECORATIONS, ERASERS, SERIES OF FICTION BOOKS, GIFT CARDS, GIFT WRAPPING PAPER, MARKERS, PAPER NAPKINS, NOTE PADS, PAPER PARTY HATS, PEN AND PENCIL HOLDERS, PENCIL SHARPENERS, DECORATIVE PENCIL TOPORNAMENTS, PENCILS, PENS, PLAYING CARDS, POSTERS, BOOKS IN THE FIELD OF COLLECTIBLES, NAMELY, DOLLS, DOLL CLOTHING AND DOLL ACCESSORIES, DRAWING RULERS, RUBBER STAMPS, STAMP PADS, STICKERS, STICKER BOOKS, FOLDERS, LUNCH BAGS, PAPER GIFT BAGS, PRINTED INVITATIONS, PERSONAL JOURNALS, TEMPORARY TATTOOS, WRITING INSTRUMENTS, PAPER BANNERS, MEMO PADS, MAGAZINES FOR TEEN-AGERS AND CHILDREN</p> <p><b>INT. CL. 18</b> BACKPACKS, BEACH BAGS, GYM BAGS, OVERNIGHT BAGS, COIN PURSES, DUFFEL BAGS, HANDBAGS, KEY CASES, LUGGAGE, SUIT CASES, UMBRELLAS, LIPSTICK HOLDERS; LUGGAGE TRUNKS, WALLET</p> <p><b>INT. CL. 20</b> SLEEPING BAGS, PLASTIC CAKE DECORATIONS, PICTURE FRAMES, JEWELRY BOXES NOT OF METAL, PILLOWS, NON-METAL KEY RINGS</p> <p><b>INT. CL. 21</b> PLATES, CUPS AND BOWLS MADE OF MELAMINE, WASTE PAPER BASKETS, BOWLS, LUNCH BOXES, PAPER CUPS, DECORATIVE PLATES, PORCELAIN FIGURINES, PAPER PLATES, PLASTIC CUPS, THERMAL INSULATED TOTE BAGS AND CONTAINERS FOR FOOD OR BEVERAGES, TOOTHBRUSHES, CAKE MOLDS, DRINKING GLASSES, MUGS,</p> <p><b>INT. CL. 24</b> BATH LINEN, BED LINEN, BED SHEETS, BED SPREADS, BED BLANKETS, PILLOW CASES, WASH CLOTHS, COMFORTERS, CURTAINS, DUST RUFFLES, PILLOW SHAMS, BATH TOWELS, BEACH TOWELS</p> <p><b>INT. CL. 25</b> BATHING SUITS, BATHROBES, BEACH COVER-UPS, BELTS, BOOTS, CARDIGANS, COATS, RAIN COATS, GLOVES, NIGHT GOWNS, HATS, HEAD BANDS, HEADWEAR, LEOTARDS, MITTENS, NIGHT SHIRTS,</p>

Trademark	Reg. No.	Reg. Date	Status	Class(es)	Goods/Services
					OVERALLS,PAJAMAS, PANTIES, SANDALS, SCARVES, SHIRTS, SLIPPERS, SOCKS, SWEATERS, TANK TOPS, THERMAL UNDERWEAR, TIGHTS, TURTLENECKS, UNDERWEAR, VESTS, CAPS, SKORTS, MITTEN CLIPS, EARMUFFS, SWIMSUITS, SWIMSUIT COVERS, HALLOWEEN COSTUMES AND MASKS; DRESSES, SHORTS, T- SHIRTS, BLOUSES, SKIRTS <b>INT. CL. 26</b> BARRETTES, HAIR BOWS, ELASTIC RIBBONS, PONYTAIL HOLDERS, SHOE LACES, ORNAMENTAL NOVELTY PINS AND BUTTONS <b>INT. CL. 27</b> RUGS, PLASTIC WALL COVERINGS <b>INT. CL. 28</b> ACTION FIGURES AND ACCESSORIES THEREFOR, STUFFED TOY ANIMALS, TOY AIRPLANES, BALLOONS, TOY BAKEWARE AND COOKWARE, SPORT BALLS, TOY BANKS, BATH TOYS, PLAYWANDS, MUSIC BOX TOYS, BUBBLE MAKING WAND AND SOLUTION SETS, CARD GAMES, CHRISTMAS TREE ORNAMENTS, CHILDREN'S PLAY COSMETICS, PARTY FAVORS IN THE NATURE OF CRACKERS OR NOISEMAKERS, PORCELAIN DOLLS, PAPER DOLLS, PARTY FAVORS IN THE NATURE OF SMALL TOYS, ICE SKATES, JIGSAW PUZZLES, JUMP ROPES, MUSICAL TOYS, PLAY SWIMMING POOLS, PLUSH TOYS, RIDE-ON TOYS, MANIPULATIVE PUZZLES, ROLLER SKATES, WATER- SQUIRTING TOYS, YO-YOS, COLLECTIBLE TOY FIGURES, DOLL HOUSES, DRAWING TOYS, IN-LINE SKATES, PLAY TENTS, PLAYHOUSES, RADIO CONTROLLED TOY VEHICLES, TALKING TOYS; SWIM GOGGLES, SWIM VESTS FOR FLOATATION FOR RECREATIONAL USE, DOLLS; PLAYSETS, NAMELY, DOLL FURNITURE, DOLL FURNITURE ACCESSORIES, TOY FOOD MAKING ACCESSORIES, NAMELY, BOWLS, SPOONS, BLENDERS, OVENS, MIXERS AND THE LIKE; DOLL CLOTHES AND DOLL ACCESSORIES; BOARD GAMES; ACCESSORIES FOR DOLL CLOTHES, TOY FURNITURE, SPECIFICALLY BEDS, WARDROBES, VANITIES AND CHESTS; DOLL CASES; TOY

Trademark	Reg. No.	Reg. Date	Status	Class(es)	Goods/Services
					VEHICLES; ELECTRONIC HAND-HELD GAMES <b>INT. CL. 30</b> EDIBLE CAKE DECORATIONS, CANDY, COOKIES, CHOCOLATE CANDY
BARBIE (Stylized)	2087842	12-AUG-1997	Renewed (Registered)	28	<b>INT. CL. 28</b> DOLL, DOLL CLOTHING AND DOLL ACCESSORIES
BARBIE (Stylized)	2639971	22-OCT-2002	Renewed (Registered)	25 28	<b>INT. CL. 25</b> T-SHIRTS <b>INT. CL. 28</b> DOLLS, DOLL CLOTHING, DOLL ACCESSORIES
BARBIE (Stylized)	2150392	14-APR-1998	Renewed (Registered)	35 42	<b>INT. CL. 35</b> ONLINE RETAIL STORE SERVICES FEATURING TOYS <b>INT. CL. 42</b> PROVIDING INFORMATION ABOUT DOLLS AND COLLECTIBLES VIA COMPUTER
BARBIE BASICS	3887194	07-DEC-2010	Registered	28	<b>INT. CL. 28</b> TOYS, GAMES AND PLAYTHINGS, NAMELY, DOLLS, DOLL CLOTHING AND DOLL ACCESSORIES
BARBIE COLLECTOR	3083593	18-APR-2006	Registered	28 41	<b>INT. CL. 28</b> TOYS, GAMES AND PLAYTHINGS, NAMELY, DOLLS, DOLL CLOTHING AND DOLL ACCESSORIES, MOLDED PLASTIC TOY FIGURINES, [ WATER GLOBES, ARTIFICIAL CHRISTMAS TREES, ] CHRISTMAS TREE ORNAMENTS <b>INT. CL. 41</b> PROVIDING EDUCATIONAL AND ENTERTAINMENT SERVICES VIA A GLOBAL COMPUTER NETWORK WEB SITE FEATURING [ GAMES, ] PRODUCT TRIVIA, [ ACTIVITIES ] AND PRODUCT INFORMATION INTENDED FOR CONSUMERS OF ALL AGES
BARBIE ENTERTAINMENT	4272482	08-JAN-2013	Registered	9 41	<b>INT. CL. 9</b> PRE-RECORDED MEDIA, NAMELY, DVDS FEATURING ENTERTAINMENT FOR CHILDREN AND TEENS <b>INT. CL. 41</b> ENTERTAINMENT SERVICES, NAMELY, THE PRODUCTION AND DISTRIBUTION OF MOTION PICTURE FILMS AND TELEVISION PROGRAMS
BARBIE FAIRY SECRET	4151281	29-MAY-2012	Registered	9	<b>INT. CL. 9</b> VIDEO GAME SOFTWARE AND VIDEO GAME APPLICATION SOFTWARE FOR MOBILE DEVICES AND TABLET COMPUTERS
BARBIE IN THE PINK SHOES	4306182	19-MAR-2013	Registered	28	<b>INT. CL. 28</b> DOLLS, DOLL CLOTHING AND DOLL ACCESSORIES
BARBIE LIFE IN THE DREAMHOUSE	4339722	21-MAY-2013	Registered	41	<b>INT. CL. 41</b> ENTERTAINMENT SERVICES, NAMELY, PROVIDING ON-GOING WEBISODES FEATURING ANIMATION VIA A GLOBAL COMPUTER

Trademark	Reg. No.	Reg. Date	Status	Class(es)	Goods/Services
					NETWORK
BARBIE MARIPOSA & THE FAIRY PRINCESS	4429518	05-NOV-2013	Registered	28	<b>INT. CL. 28</b> DOLLS, DOLL CLOTHING AND DOLL ACCESSORIES
BARBIE THE DREAMHOUSE EXPERIENCE	4495483	11-MAR-2014	Registered	28	<b>INT. CL. 28</b> TOYS, GAMES AND PLAYTHINGS, NAMELY, DOLLS, DOLL CLOTHING AND DOLL ACCESSORIES
TEAM BARBIE	4403388	17-SEP-2013	Registered	28	<b>INT. CL. 28</b> DOLLS, DOLL CLOTHING AND DOLL ACCESSORIES, TOY FIGURES AND ACCESSORIES THEREFOR
THE BARBIE LOOK	4325862	23-APR-2013	Registered	28	<b>INT. CL. 28</b> DOLLS, DOLL CLOTHING AND DOLL ACCESSORIES
BARBIE	4572684	22-JUL-2014	Registered	43	<b>INT. CL. 43</b> RESTAURANT SERVICES, CAFE SERVICES
BARBIE AND THE NUTCRACKER	4720463	14-APR-2015	Registered	28	<b>INT. CL. 28</b> TOYS, GAMES AND PLAYTHINGS, NAMELY, DOLLS, DOLL CLOTHING AND DOLL ACCESSORIES;
BARBIE AND THE SECRET DOOR	4664431	30-DEC-2014	Registered	28	<b>INT. CL. 28</b> DOLLS, DOLL CLOTHING AND DOLL ACCESSORIES
BARBIE IN PRINCESS POWER	4717428	07-APR-2015	Registered	28	<b>INT. CL. 28</b> DOLLS, DOLL CLOTHING AND DOLL ACCESSORIES
BARBIE IN THE PEARL PRINCESS	4507083	01-APR-2014	Registered	28	<b>INT. CL. 28</b> DOLLS, DOLL CLOTHING AND DOLL ACCESSORIES
BARBIE LIFE	4683609	10-FEB-2015	Registered	9	<b>INT. CL. 9</b> COMPUTER APPLICATION SOFTWARE FOR MOBILE PHONES AND MOBILE DEVICES, NAMELY, SOFTWARE USED TO ACCESS WEBSITE CONTENT, NON-DOWNLOADABLE MOVIES AND VIDEOS, NON-DOWNLOADABLE MUSIC, COMPUTER GAMES AND DIGITAL WALLPAPER
BARBIE STYLE	4626002	21-OCT-2014	Registered	28	<b>INT. CL. 28</b> DOLLS, DOLL CLOTHING AND DOLL ACCESSORIES
HOUSE OF DREAMS BY BARBIE	4728445	28-APR-2015	Registered	25	<b>INT. CL. 25</b> LINGERIE AND SLEEPWEAR

Many of these registrations are incontestable, and all are currently subsisting.

7. In addition, Mattel has also applied for other federal trademark registrations to protect the BARBIE® Marks, as evidenced by the following applications:

Trademark	App. No.	App. Date	Status	Class(es)	Goods/Services
BARBIE	86075289	26-SEP-2013	Pending Intent to Use	32	INT. CL. 32 BEVERAGES, FRUIT JUICES
BARBIE DREAMHOUSE	86226011	19-MAR-2014	Pending Intent to Use	25	INT. CL. 25 CLOTHING, NAMELY, T-SHIRTS
MALIBU BARBIE	86523803	04-FEB-2015	Pending Intent to Use	28	INT. CL. 28 TOYS, GAMES AND PLAYTHINGS, NAMELY, DOLLS, DOLL CLOTHING AND DOLL ACCESSORIES
BARBIE DREAMHOUSE	86584385	01-APR-2015	Pending Intent to Use	25	INT. CL. 25 TOPS, BOTTOMS, SWEATSHIRTS, HOODED SWEATSHIRTS, SWEATPANTS, PANTS, SHORTS, SWEATERS, DRESSES, SKIRTS, SWIMWEAR; HEADWEAR; FOOTWEAR

Some of these applications have been published, and all are currently subsisting.

8. Mattel has invested significant resources in advertising and promoting goods and services sold or offered under its BARBIE® Marks, and Mattel has used the marks (and continues to use the marks) in connection with the sale or offering of a large volume of quality goods and services. As such, consumers and others regard Mattel as the origin of goods or services sold or offered under the “BARBIE” name, and Mattel has built up considerable goodwill in the BARBIE® brand. The BARBIE® Marks acquired distinctiveness, fame, and renown among consumers and the public at large well before Applicant’s alleged date of first use.
9. Upon information and belief, Applicant will offer the Subject Services under the BRONZED BARBIE mark to a variety of customers, many of whom are likely to



be familiar with, or actual purchasers or users of, goods or services offered or provided by Mattel under one or more of its BARBIE® Marks.

10. Applicant's mark appropriates Mattel's BARBIE® mark in its entirety.
11. On its specimen and on its website home page (thebronzedbarbie.com), Applicant is using additional indicia to suggest a connection with Mattel's BARBIE® brand, such as depicting a "customer" that resembles the iconic BARBIE® doll:



12. Mattel has not given Applicant permission to use the BARBIE® mark.
13. Mattel's priority dates for all of the BARBIE® Marks listed above predate Applicant's filing of the Subject Application and its claimed date of first use.
14. If Applicant is awarded a registration for BRONZED BARBIE as a mark in Class 44 for the Subject Services, Applicant would be entitled to the presumptions flowing from such registration, all to the injury of Mattel.

15. Applicant's use of BRONZED BARBIE to identify the Subject Services is thus likely to cause consumers mistakenly to believe that services provided by Applicant under that mark are somehow related to goods or services sold or offered by Mattel under one or more of its BARBIE® Marks, or that some or all of Applicant's services actually originate from, or are somehow sponsored or approved by, Mattel (or vice versa). Such confusion and mistake on the part of consumers is likely to cause injury to Mattel.
16. Concerned about the potential for confusion and for harm, Mattel timely filed this Notice of Opposition within the prescribed statutory period.
17. Accordingly, registration for the mark applied for in Serial No. 87233504 should be refused under the provisions of Section 2(d) of the Trademark Act.
18. As a result of Mattel's long, extensive, and continuous use, as well other factors listed in Section 43(c) of the Trademark Act, the BARBIE® mark has, since long before Applicant's claim date of first use, become famous within the meaning of Section 43(c) as identifying Mattel as the source of goods and services provided under or using the "BARBIE" designation.
19. Applicant's use of BRONZED BARBIE to identify the Subject Services would dilute the distinctive quality and harm the reputation of the famous BARBIE® mark,

and, thus, is likely to cause dilution as set forth in Section 43(c) of the Trademark Act, both by blurring and by tarnishment, and injure Mattel.

20. Accordingly, registration for the mark applied for under Serial No. 87233504 should also be refused under Sections 2 and 43(c) of the Trademark Act.

WHEREFORE, Opposer, Mattel, prays that Serial No. 87233504 be rejected, that no registration be issued to Applicant, and that this opposition be sustained in favor of Mattel. All communications regarding this opposition should be addressed as follows:

Edward T. Colbert  
William M. Merone  
ANDREWS KURTH KENYON LLP  
1350 I Street, N.W.  
Washington, D.C. 20005  
Tel.: (202) 662 – 2700  
Fax: (202) 662 – 2739  
E-Mail: [tmdocketdc@andrewskurthkenyon.com](mailto:tmdocketdc@andrewskurthkenyon.com)  
[ecolbert@andrewskurthkenyon.com](mailto:ecolbert@andrewskurthkenyon.com)  
[wmerone@andrewskurthkenyon.com](mailto:wmerone@andrewskurthkenyon.com)

Respectfully submitted,

ANDREWS KURTH KENYON LLP

Date: June 12, 2017

By: /William M. Merone/  
Edward T. Colbert  
William M. Merone  
Erik C. Kane  
ANDREWS KURTH KENYON LLP  
1350 I Street, N.W.  
Washington, D.C. 20005  
Tel.: (202) 662 – 2700  
Fax: (202) 662 – 2739

*Counsel for Opposer,  
Mattel, Inc.*